\U.S. EPA – Region 8 – MT Office Event Plan

Activity	Doug Benevento, Region 8 Administrator (RA) tour of Anaconda Smelter Superfund site and visit with Anaconda community members	
Date/Time	Wed. Nov. 15, 2017 @ 9:30 am – 4 pm	
Venue	• Tour: Anaconda Montana • Community Meeting: Old Works Golf Club 1205 Pizzini Way	
EPA Team	RA; Joe Vranka, MT Superfund Unit Sup. (406.439.6142); Charlie Coleman, Project Manager 406.459.1791; Charlie Partridge, EPA Toxicologist	
Invitees for Community Meeting	Point of Contact: Bill Everett, Chief Executive Officer Anaconda-Deer Lodge County 406-563-4000; BEverett@adlc.us) will invite: • Terry Vermeire, Anaconda-Deer Lodge County Commissioner • Carl Nyman, Anaconda-Deer Lodge Superfund Coordinator • Brion Lindseth, ADLC Contract Attorney • Jennifer Hepp, ADLC Contract Attorney • Elizabeth Erikson, Principal WET • Mike Grayson, ADLC Contract Attorney. (* This is Mr. Everett's Core Team that will attend lunch meeting prior to community meeting and field trip after) • Frank Fitzpatrick, Chairman Anaconda Deer Lodge County Superfund Taskforce • Danielle Tribble, Senator Daines Field Rep	EPA will invite: • Steve McNeece, CEO Community Hospital • Gerry Nolan, Superintendent Anaconda Schools • Jim Davison, Executive Director Anaconda Local Development Corporation Gene Vuckovich, Senate District 039 • Mark Sweeney, President Arrowhead Foundation • Anthony Benes Superintendent Golf Course • Mike King, President Golf Course Authority Board • Luke Pokorny, AR Project Manager • Erik Nylund, Senator Tester Regional Director • Caleb Hinkle, Representative Gianforte Field Rep. • Gordon Pierson, House District 078 • Kathy Swanson, House District 077 News Media: • Kathy Miller, Editor Anaconda Leader Newspaper • Susan Dunlap, Reporter MT Standard Newspaper

EPA Objectives:

- RA will have visited key areas of the Anaconda Smelter Superfund site and gain and overview of the project.
- RA and EPA site team will have met with leaders of Anaconda and identify community issues and concerns.
- Anaconda community members will have had an opportunity to meet the RA, raise concerns, and ask questions.

Community Issues:

- Concern that the cleanup in Anaconda is inadequate – soil arsenic action level is too high/not protective; attic dust is too limited; schools and parks have not been a priority in cleanup
- Belief that private property should be restored to original conditions – Cleanup vs restoration
- More should be done to redevelop the community considering lack of infrastructure, developable space and capital.

Agenda:

8:00 am – 9:30 am	Depart Helena, travel to Anaconda	RA, EPA site team
9:30 am – 11:30 am	Tour of Anaconda Smelter Superfund Site	
11:30 am – 1:00 pm	Meet with County's Core Team over Lunch	RA, EPA site team, ADLC Core Team
1:00 pm – 2:30 pm	Community meeting	RA, site team, all invitees
2:30 – 4 pm	Additional time with Chief Executive	RA, ADLC Core Team
4 pm – 5:30 pm	Depart Anaconda, return to Helena	RA, EPA site team

Capstone Talking Points:

- In recognition of the priority issues involved with Superfund in Montana, RA is making a return trip early in his tenure to learn firsthand more about the issues and concerns from the perspective of the community.
- RA will visit the Anaconda Smelter site to get an overview of the project, meet with members of the community, and show his commitment to moving faster and smarter to implement a comprehensive cleanup in Anaconda.
- Public comments and community input is essential in the Superfund process to ensure EPA decisions are based on the best information available.

Q&A:

Why is Anaconda's arsenic action level (250 mg/kg) one of the highest in the country?

- The arsenic action level at 250 mg/kg is within EPA's acceptable risk range (because of low arsenic bioavailability) and was supported by the State of Montana.
- The action level is used to address "hot spots" within the community. The cleanup is intended to reduce the overall average arsenic risk to approach Montana's risk goal for a residential property.
- In Anaconda where arsenic and lead are being cleaned up, the resulting average arsenic concentration in yards approaches 100 mg/kg.
- Additionally, ICs are in place to address residual arsenic encountered through excavation or redevelopment
- If the county eliminates these ICs, EPA will likely revise the soil cleanup design.

Why isn't interior dust in schools/residences being sampled and cleaned up?

- Previously in 2013, EPA had amended the ROD for the Community Soils Operable unit to implement measures including sampling and cleanup of interior dust. However, during the design phase, data collected indicated that contamination from the smelter was not a major source of contamination in homes and that the county desired a dust abatement program to address dust contamination from other sources (lead paint)
- As a result of the remedial design, EPA finalized an ESD in 2016 that, in lieu of sampling interior dust, approved the county's Interior Dust Program that included:
  - Community Education program to raise awareness of potential sources of arsenic and lead in the home including non-smelter sources such as lead paint, products, and food sources.
  - Cleaning, hygiene and diet guidance; HEPA vacuum Cleaner loaner program; Renovation starter kits; Home inspections
- EPA is listening to the County and considering their new position to sample interior dust under the Community Soils remedy

Why aren't all attics being sampled and cleaned up?

- Currently attic dust cleanup is limited to attics where there is a potential exposure pathway. This would include attics being used as a living space, or other exposure (i.e., cracks, openings, furnace intakes, etc.)
- There is no exposure or risk as long as there is no access to attics/ceilings similar to contaminated dust in walls.
- ARCO has offered to expand attic dust cleanup if implemented through a county IC program.

Why is residential cleanup taking so long?

- Although some of the earliest cleanup at the site was directed at residential areas (Mill Creek relocation, yard removals), EPA continues to address residential soils as new science and information becomes available.
- Risk analyses in the 1990's indicated that arsenic was the contaminant of concern and remediation sampled nearly 2000 home and cleanup over 350 homes.
- In the 2000" s CDC guidelines for lead contamination lowered. As a result, EPA conducted additional studies and risk analysis and ultimately modified the community soils remedy in 2013.
- In 2015, EPA directed ARCO to resample the 2000 homes for lead and any others properties requested by landowners. Additionally, properties where former railroad or trolley lines ran will also be sampled.
- All schools, parks and daycares will be sampled in 2018
- Sampling and cleanup will continue through 2022+.

Why haven't schools been test before?

- School soils were sampled during the remedial investigation in the early 1990's. Based on this data and risk analyses, it was determined that schools were not at risk and did not require remediation. However, as the arsenic cleanup effort in Anaconda expanded to east of Main St., Lincoln and Fred Moodry schools were sampled. Fred Moodry school was cleaned up in 2004.
- Starting this year all schools will now be tested for lead. This sampling will be completed in 2018.
- Like residential properties there is no plan to sample the interior dust sampling of schools unless there is identified attic type spaces.

What is the status of the Arrowhead Foundation (TAG recipient)?

- The Arrowhead Foundation is a non-profit organization and completely independent of EPA.
- They are currently a recipient of a Technical Assistance Grant (TAG) from the EPA in the amount of $50,000.00.
- The Arrowhead Foundation has received a TAG since June, 1994 with a cumulative total of $900,000.00

What is the status of the Superfund Library?

- The EPA is in the process of establishing an information repository for the Anaconda Smelter site in Anaconda. This will be a small collection of key site documents, fact sheets, and other relevant information. The location of the information repository will be determined after we complete further community interviews and identify the ideal community location. We hope to have a location identified before the end of the year.
- The current Superfund Library located at 118 East Seventh Street in Anaconda is not managed by the EPA. Superfund documents are provided by EPA to Anaconda-Deer Lodge County (ADLC) where they can be accessed by the public through either ADLC or Arrowhead. You may want to follow up with the Anaconda Deer Lodge County about the status of that Library.

What is the status of Benny Goodman Park?

- Based on the currently available data, the park may be used for its intended purpose.
- In 2017, the County worked with the Atlantic Richfield Co. to replace sand in the sandpits.
- In 2018 EPA is requiring Atlantic Richfield to remediate the reminder of the park.

Why is the lead cleanup action level lower in Anaconda than SBCBA?

- Anaconda lead bioavailability is higher than in SBCSA, thus a lower cleanup level. Additionally, SBCSA has extensive IC's that address multiple sources of lead compared to Anaconda.

Is there contamination in Butte because of the historic Anaconda smelter?

- EPA has not seen data to indicate contamination from the Anaconda Smelter has impacted Butte. However, smelter contamination from Anaconda does extend over the Butte-Silver Bow county boundary near Anaconda.

More About Anaconda

- The 300-square-mile Anaconda Co. Smelter site is located at the southern end of the Deer Lodge Valley in Montana, at and near the location of the former Anaconda Copper Mining Company.
- As a result of ore processing operations, wastes contaminated soil groundwater and surface water with hazardous chemicals.
- The contaminants of concern at the site are arsenic, copper, cadmium, lead and zinc.
- EPA placed the Anaconda Co. Smelter site on the National Priorities List (NPL) September 1983.
- Cleanup is complete at several areas within the site and operation and maintenance activities are ongoing at these areas. cleanup activities are underway at the remaining areas.
- The site consists of multiple areas, referred to by EPA as operable units (OUs).
  OU15, Mill Creek: The remedy selected in 1987, included permanently relocating all Mill Creek residents, removing demolition debris and contaminated soils for later disposal, regrading and replanting areas disturbed by relocation/demolition activities, monitoring and maintaining the vegetation, and controlling access to the area. Construction of the remedy finished in late 1988. Operation and maintenance activities are ongoing.
  OU11, Flue Dust: The remedy selected in 1991, included stabilization of about 316,500 cubic yards of flue dust, placement of the treated materials in an engineered repository, long-term maintenance and monitoring, and institutional controls. The remedy required that the repository include a liner, leak detection and collection system, groundwater monitoring wells, and a cap. Construction of the remedy finished in September 1996. Operation and maintenance activities are ongoing.
  OU7, Old Works/East Anaconda Development Area: The remedy selected in 1994, included placement of engineered covers over waste, treatment of soils, surface water controls, upgrades or repairs to streambank levees, replacement or repairs to bridges, institutional controls, long-term monitoring and preservation of historic features. OU7 consists of six subareas. Construction is complete at five of the six areas. Construction at the sixth area, the Industrial Area, is nearly complete.
  OU16, Community Soils: The remedy for residential soils, selected in 1996 and modified in 2013, included removal of arsenic-contaminated soils and replacement with clean soil. This remedy also called for the cleanup of future

residential soils through institutional controls. The remedy for commercial/industrial areas and the active railroad area included placement of engineered covers. Construction of the remedy was finished in 2010. Operation and maintenance activities are ongoing. The 2013 modification to the Community Soils remedy, included cleanup of lead-contaminated residential soil, expanding the institutional controls program and development of an interior dust abatement program. Implementation of this remedy began in 2015 and is ongoing.

OU4, Anaconda Regional Water, Waste and Soil: The remedy selected in 1998 and modified in 2011 included consolidation of miscellaneous waste materials, placement of engineered covers over waste management areas, treatment of contaminated soils, storm water controls and institutional controls, including the monitoring and regulation of domestic wells in groundwater areas. A Technical Impracticality Waiver for arsenic in groundwater has been applied to large areas of the site. The OU consists of 15 subareas. Remedial action is ongoing at most of the subareas. Over 10,000 acres have been remediated to date. Construction is expected to be completed over the next 10 years.

- Cleanup has been ongoing since late 1980's; over $350 million has been spent on cleanup to date.
  - Nearly 1000 residential and commercial properties have been cleaned up to date, with another 1000 to be completed in the next three+ years.
  - All domestic wells and/or water supplies have either been tested and/or remediated (treatment units) within the site. Wells will be continued to be sampled/treated.
  - Over 3 million cubic yards of waste have been removed from the community and consolidated onto AR property.
  - Over 5000 acers of the former smelter facility and disposal areas have been capped and revegetated.
  - Nearly 1000 acers of new wetlands have been constructed and another 5000 acers protected.
  - Over 12,000 acers of adjacent contaminated soils have been reclaimed and support wildlife & grazing lands.
  - 140,000 feet of stormwater controls placed to reduce contaminated sediments from impacting streams
  - 30,000 feet of stream have been restored providing for a high-quality fishery.
  - EPA recently released an ESD for the community soils remedy and a proposed plan for the Anaconda Regional Water, Waste and Soils (ARWWS) 2017. EPA is considering public comments before making a final decision.
- Cleanup work was coordinated with local development partners for current reuse: Jack Nicklaus Golf Course; Regional Prison Facility; Peak Power Generating Plant; Campus complex; residential and commercial developments; Reuse of slag materials as a commercial product. A processing facility is currently being constructed to turn slag into proppant and pig iron.

Recent/ongoing Community Involvement

- 7/2017 Site update & Community Soils update fact sheets distributed to public
- Website with timely updates, fact sheets and technical documents related to the site
- TAG grant to Arrowhead Foundation and working with them to disseminate site information to the public
- Congressional updates to Senator Daines and Tester's office during regular monthly briefings.
- Interviews with local news media
- 7/20/2017 public meeting – site update and proposed plan (with public comment periods)
- Fifth 5-Year Review completed in 2015.
- Community involvement plan to be updated early 2018; community interviews to be scheduled Nov, Dec 2017.

3-day Timeline: RA, MT Visit

Date/time	Event	location	Key points/people
Tue 11/14			
11 am – 12 pm	Pre-briefing SBCBA	John Wardell Room; EPA MT Office; 10 West 15th Street,	Joe, Henry Elsen, Nikia
1 pm – 2 pm	Availability with MT Dept. of Ag	Helena; 3rd Floor	State Dept. of Ag. Employees
3 – 4 pm	Call with State	Conference call	negotiating team
Wed 11/15			

8 am	Depart for Anaconda		RA; Site Team
9:30 – 1:30 am	Anaconda Smelter Superfund Tour	• W. Galen • Triangle Waste Area Trailer • Opportunity ponds • Warm Springs Creek • Redevelopment Corridor • Smelter Stack • East Yards • Railroad Corridor • Old Works Golf Course	RA; Site Team • Reclamation, grazing, wildlife • Atlantic Richfield office, pre-entry briefing • Wetland restoration, waste repository, groundwater treatment • Restoration, wetland preservation USFWS • CCCS Prison; NW Energy Power Plan; New Slag Facility • Stormwater controls; repository complex • Aware Inc Campus; Benny Goodman Park • A-1 Lumber; Georgetown comments; Hospital expansion • Conveyance agreement; redevelopment issues
11:30 am – 1 pm	Meeting with County over lunch	Old Works Golf Course 1205 Pizzini Way, Anaconda, MT	• RA, site team, • ADLC Core Team • Susan Dunlap with MT Standard possible
1 – 2:30	Community Meeting (See format below)	Old Works Golf Course 1205 Pizzini Way, Anaconda, MT	• RA, Site team • community invitee list
2:30 pm – 4 pm	Follow up meeting and additional time with Bill Everett	Field tour/quick stops around Anaconda to highlight economic challenges linked to site contamination.	• RA, site team, • ADLC Core Team • Susan Dunlap with MT Standard possible
4 pm – 5:30	Depart Anaconda, return to Helena		• RA, site team,
Thu 11/16	BPSOU Principles Meeting		Joe, Henry Elsen, other?

Format for Community meeting:

12:45 – 1 pm	Transition from lunch meeting with ADLC core team as participants start to arrive early	
1 – 1:15 pm	Formally start meeting; introduction of RA & Site team; goals of meeting (informal listening session)	Elizabeth Ericksen facilitates
1:15 – 2:00 pm	Self-introduction of community participants and issue identification (1-3 minute per person)	Community participants
2:00 – 2:25 pm	Q&A	All
2:25 – 2:30	RA final remarks, depart for field tour	

Task	Lead	Method	Deadline	status
Prep event plan; Q&A	Robert	Word documents	11/13 @ Start of Business	drafted
Coordinate with ADLC: Id guests; secure venue	Bill Everett Robert	Email, phone	11/13	11/8 draft guest list
FYI to DEQ (1 page event plan overview)	Robert	Email	11/13	11/13
Draft and deliver invitations	ADLC Charlie	Email - Outlook calendar invite	11/1	11/13
Assemble meeting packet	Robert, Charlie	Agenda; sign in sheet; fact sheets	11/14 COB	11/14